

Exhibit 3:

Roshna Bala Keen Resume

Roshna Bala Keen

Roshna Bala Keen is a partner at Loevy & Loevy. She represents clients in a wide range of civil rights cases. Her primary areas of practice are wrongful convictions, sexual assault by law enforcement, and unconstitutional conditions in jails and prisons. She also handles False Claims Act litigation and enjoys representing whistleblowers alleging contractor (MBE/DBE) fraud, Medicare fraud, and tax fraud.

Ms. Keen is an experienced trial and appellate attorney and has successfully tried numerous cases in front of federal and state juries, including a jail strip search class action that ultimately settled for \$55 million. She has also represented criminal defendants in post-conviction evidentiary hearings and a criminal trial. Ms. Keen is also an experienced appellate attorney. Some of her recent wins include: *Holmes v. Slay* (8th Cir. 2018)(successfully defended jury verdict and secured favorable ruling in novel 404(b) issue); *Anderson v. City of Rockford* (7th Cir. 2019)(reversed the grant of summary judgment on fabrication and *Brady* claims); *Peterson v. Heymes* (6th Cir. 2019) (successfully defeated collateral estoppel and qualified immunity challenges to due process claim); *State of Missouri v. Holmes* (Mo. App. Ct. 2013) (secured ruling in appellate court requiring the state to indemnify judgments against police officers for civil rights violations); *Cook v. City of Tyler, et al.* (5th Cir. 2020) (secured dismissal of appeal for lack of jurisdiction in wrongful convictions suit).

Prior to joining Loevy & Loevy, Ms. Keen was an associate at Sidley Austin LLP, where she worked on internal investigations, general corporate litigation, and an extensive list of *pro bono* matters, including the representation of a death row inmate in Alabama in partnership with the Equal Justice Initiative.

Ms. Keen received her law degree from Northwestern University Law School in 2004 and her undergraduate degree from the University of Chicago in 1999. Her *pro bono* commitments including providing volunteer legal services for First Defense Legal Aid (where she served on the board for many years) and the Animal Legal Defense Fund. She taught Animal Law at the University of Chicago Law School in 2014 and 2015. Prior to attending law school, she worked at Foreign Affairs Magazine and the Council on Foreign Relations.

Education:

Northwestern University School of Law

- **J.D. – 2004**

The University of Chicago

• A.B. – 1999

Representative cases:

- *Holmes v. Sharp et al* (E.D.Mo.). Trial counsel for Mr. Holmes, who was wrongfully convicted of drugs crimes based on fabricated evidence, and subsequently imprisoned for five years. Secured a \$2.5 million jury verdict against the two former St. Louis Metropolitan Police Officers on claims of fabrication, malicious prosecution, and false imprisonment.
- *Kluppelberg v. Burge et al.* (N.D.Ill.) Litigation counsel for Mr. Kluppelberg, who was wrongfully convicted of murder and spent nearly 25 years in prison based on fabricated arson evidence and perjured testimony from a jailhouse snitch.
- *Whitcomb v. Huskins et al.* (W.D.Ark.). Litigation counsel for Denise Whitcomb, who died in a county jail in Arkansas from pancreatic cancer after being denied medical care or pain medication. Obtained a \$1 million settlement, reportedly the largest civil rights payout in Arkansas history, plus changes to the jail's medical segregation policy.
- *Lemons v. City of Milwaukee et al.* (E.D.Wis.). Litigation counsel for Ms. Lemons, who was sexually assaulted by an on-duty police officer. Obtained summary judgment against the individual officer and defeated summary judgment motions by the City of Milwaukee and three present and former chiefs of police, against whom Ms. Lemons asserted municipal liability and failure to supervise claims. Case settled for \$2.5 million.
- *Doe v. Clavijo et al.* (N.D.Ill.). Litigation counsel for Jane Doe, who was sexually assaulted by an on-duty Chicago Police officer. Obtained a \$450,000 settlement from the city.
- *Doe v. Starks et al.* (N.D.Ill.). Litigation counsel for Jane Doe, who was sexually assaulted by an on-duty Chicago Police officer. Obtained a \$400,000 settlement from the city, plus individual payments by the police officer defendants.
- *Patterson v. Chicago et al.* (N.D.Ill.) Litigation counsel for Mr. Patterson, who was wrongfully convicted of murder and spent 8 years in prison until DNA exonerated him. Secured a \$4.2 million settlement for Mr. Patterson in civil rights suit alleging that Chicago Police Department and Illinois State Police crime lab withheld exculpatory evidence and deprived him of a fair trial.
- *Ross v. State of Illinois* (Ill). Successfully overturned Mr. Ross's conviction of a crime of which he was innocent, in state post-conviction proceeding. Trial counsel in Mr. Ross's criminal re-trial, which resulted in a finding of not guilty. Currently

representing Mr. Ross in civil litigation against the Rockford Police Department arising out of his wrongful conviction.

- *Towler v. DeChant et al.* (N.D. Ohio). Obtained a multi-million-dollar settlement for Mr. Towler in a civil rights lawsuit stemming from wrongful conviction and 29-year incarceration on a rape charge, of which he was later exonerated by DNA testing.

- *Young v. Dart* (N.D.Ill.). Trial and litigation counsel for certified class of 300,000 detainees at Cook County Jail, who were improperly strip searched. Following a liability trial and bellwether damages trials, the case resolved in a \$55 million settlement for the class.